



Gottlieb & Janey LLP  
Trinity Building  
111 Broadway, Suite 701  
New York, NY 10006  
Tel: (212) 566-7766 · Fax: (212) 374-1506  
www.gottliebjaney.com  
New York · London · Rome

February 14, 2019

**VIA ECF**

The Honorable Judge Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:    *Cottam v. Global Emerging Capital Group, LLC, et al.*,  
1:16-cv-04584-LGS (SDNY)**

Dear Judge Schofield:

This law firm represents the plaintiff, Dr. John Cottam (the “Plaintiff”), in the above-referenced action. We write to the Court concerning our representation of Plaintiff and, relatedly, to request that the action be stayed for a period of 30 days.

Between the firm, on the one hand, and Plaintiff, on the other, there is now a fundamental disagreement as to how this matter should proceed to trial, including with respect to the costs attendant thereto. Plaintiff has advised that he now wishes to proceed in the action *pro se*.

Given the gravity of Plaintiff’s proposed course of action, undersigned counsel, rather than seeking an order of the Court granting leave to withdraw immediately, requests that the action be stayed for a period of thirty days to afford Plaintiff sufficient time to identify and retain substitute counsel, *if he should choose to do so rather than proceed pro se*. Although the requested stay will require a short extension of the final discovery deadlines in the Court’s November 16, 2018 Case Management Plan and Scheduling Order, any delay will be minimal as discovery has been substantially completed but for one party deposition and two expert depositions.

Respectfully submitted,

GOTTLIEB & JANEY LLP

A handwritten signature in black ink, appearing to read "Derrelle M. Janey", written over a horizontal line.

By: Derrelle M. Janey

cc:    Tom Fini, Esq. (via email & ECF)  
      All counsel of record (via ECF)  
      Dr. John Cottam (via email and first class mail)